
Sustainability Appraisal Addendum Report

Sustainability Appraisal & Strategic Environmental Assessment of the Local Plan (Part 1) 2013

Prepared for
Cannock Chase District Council

November 2013

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Abbreviations

AONB	Area of Outstanding Natural Beauty
CCDC	Cannock Chase District Council
CfSH	Code for Sustainable Homes
DPD	Development Plan Document
LDD	Local Development Document
NPPF	National Planning Policy Framework
SA	Sustainability Appraisal
SAC	Special Area of Conservation, as designated by the EC Habitats Directive (92/43/EEC)
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment

1. Introduction

1.1 The Context of this Report

Cannock Chase District Council (CCDC) has produced its Local Plan to guide planning and development in the District to 2028. The Local Plan is a development plan document (DPD) that is required to be produced under the Planning and Compulsory Purchase Act 2004 (as amended). The Local Plan for Cannock Chase has been split into two parts; the Local Plan (Part 1) Proposed Submission was submitted for examination in May 2013 and Part 2 will be issued at a later date.

The Local Plan (Part 1) brings together the former emerging Core Strategy and Rugeley Town Centre Area Action Plan into one document. It provides the context and process for setting strategic and development management policy for the Cannock Chase District, with the second section providing the more detailed policy context for Rugeley town centre. Local Plan (Part 2) will identify site specific allocations as well as the various standards to be applied in order to help deliver the strategic policy. Part 2 will also help address Birmingham's housing needs should this be necessary following further evidence gathering, either by identifying further capacity within the plan period or safeguarding land for development beyond the plan period. In addition, Part 2 will safeguard sites for potential development beyond the plan period to help meet future District needs. This will include a Green Belt Review. Local Plan policy will also be elaborated, where justified, by Supplementary Planning Documents (SPDs).

The Local Plan (Part 1) has been written to comply with the Localism Act and the National Planning Policy Framework (NPPF). Sustainability Appraisal (SA) is required¹ during the preparation of all Local Plans to assess how the plan will contribute to sustainable development. This applies to any of the documents that can form part of a Local Plan, including core strategies, site allocation documents and area action plans. The SA of the Cannock Chase Core Strategy (later to become part of the Local Plan (Part 1)), began in 2005 and has been iteratively developed alongside the plan since that time. The final SA Report, which documents the SA of the Cannock Chase Local Plan (Part 1) Proposed Submission February 2013, was submitted in January 2013. The SA Report relates only to the Local Plan (Part 1). The SA forms part of 'a sound evidence base for the plan' and has been an integral part of the plan preparation process. Since its inception, the SA has incorporated a Strategic Environmental Assessment (SEA) that complies with the requirements of the EU's SEA Directive (2001/42) and the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument No.1633), otherwise known as the SEA Regulations.

The Local Plan (Part 1) Proposed Submission was published for consultation by CCDC in February 2013, together with other "proposed submission documents", before its submission to the Planning Inspectorate for examination in May 2013. The examination hearing sessions ran from the 24th – 27th September. As part of the examination process, the Inspector can recommend 'main modifications' (changes that materially affect the policies) to make the Local Plan (Part 1) Proposed Submission sound and legally compliant only if asked to do so by the local planning authority under section 20(7C) of the 2004 Planning and Compulsory Purchase Act as amended). The Council can also put forward 'additional modifications' of its own to deal with more minor matters. Since the examination in September 2013, the Council has made 'main modifications' and 'additional modifications' to its Local Plan (Part 1) Proposed Submission.

Inspectors require the local planning authority to consult upon all proposed main modifications. Depending on the scope of the modifications, further SA work may also be required.

This addendum describes how the main and additional modifications alter the findings of the SA. The main focus of the SA is the main modifications since these are being proposed to address issues of 'soundness' and/or legal compliance. Additional modifications are for minor clarifications or corrections only, however they have been considered in the context of the main modifications for completeness.

¹ SA of Core Strategies, and now Local Plans, is a requirement of the Planning and Compulsory Purchase Act (parag. 19.5). The more recent National Planning Policy Framework 2012 (parag. 165) now also stipulates the requirement for an SA incorporating SEA.

The addendum also describes any key changes to the baseline information or the planning context of the Local Plan (Part 1) since the submission of the SA Report in January 2013.

This addendum should be read in conjunction with the main SA Report, the Local Plan (Part 1) Proposed Submission (2013) and the Main and Additional Modifications to the Local Plan (Part 1) Proposed Submission.² The main SA report provides a description of the SA process, the assessment of the Local Plan (Part 1) Proposed Submission against SA objectives and recommendations for mitigation and monitoring.

² *Schedule of Proposed Main Modifications to Local Plan (Part 1) – as at October 2013 and Schedule of Proposed Additional Modifications to Local Plan (Part 1) – as at October 2013*

2. Changes to Planning Context and Baseline Information

2.1 Review of Relevant Plans, Programmes and Legislation

A review of relevant plans, programmes and changes to the planning and legislative framework has been undertaken to determine whether any changes in these plans and programmes influence the findings of the SA of the Local Plan (Part 1).

Table 2.1 shows the principal changes to the relevant plans and programmes that have occurred since the publication of the final SA Report in January 2013. These plans and programmes form the planning context of the Local Plan (Part 1) and are available in full as Appendix B to the main SA Report.

Only the plans that have been modified are included in Table 2.1. Deleted text in the table is shown as ~~struck through~~ and additional text shown in **bold**.

Table 2.1 Plans and Programme Updates since Submission of the SA Report in January 2013

Title of Policy, Plan, Programme or Legislation	Summary & Key Objectives	Relevance to Local Plan (Part 1)
NATIONAL		
PLANS AND POLICY DOCUMENTS		
<p>UK Biodiversity Action Plan 1994</p> <p>Natural Environment and Rural Communities Act (NERC) 2006</p>	<p>Outlines the UK Government's approach to biodiversity conservation in response to the 1992 Rio Convention. It involves the development of action plans to manage ecologically important species and habitats.</p> <p>The government has a commitment "to conserve and enhance the biological diversity within the UK and to contribute to the conservation of global biodiversity through all appropriate mechanisms". Under the Natural Environment and Rural Communities (NERC) Act 2006, an England Biodiversity List of habitats and species of principal importance was developed, and this is based on and replaces the UK Biodiversity Action Plan (UK BAP) list of priority habitats and species.</p>	<p>The Biodiversity Action Plan for Staffordshire should be consulted when developing the Local Plan Part 1 in order to mitigate potential conflicts.</p> <p>The Local Plan (Part 1) should help to ensure the protection of designated biodiversity sites and those habitats and species of principal importance that appear on the England Biodiversity List</p>
COUNTY		
<p>Staffordshire and Stoke Waste Local Plan 2013</p>	<p>The Joint Waste Local Plan provides a new vision highlighting what is to be achieved in terms of developing facilities to improve the way in which waste is managed. Furthermore, the Plan includes a set of updated policies that identify the ways in which the vision for the Plan can be delivered.</p>	<p>The goals of reducing waste and promoting resource efficiency are reflected in the Post Submission Version Local Plan (Part 1) vision, district-wide objectives and Policy CP16</p>
<p>Environmental Capacity in Cannock Chase District 2013</p>	<p>The study sought to address environmental issues that fell under a number of principal themes. These themes were:</p> <ol style="list-style-type: none"> 1. Carbon emissions. 2. Air quality. 3. Water quality. 4. Water supply. 5. Flood risk. 6. Biodiversity. 	<p>Each of the themes that were covered in the Study are addressed in the Post Submission Version Local Plan (Part 1) district wide objectives or policies.</p>

Title of Policy, Plan, Programme or Legislation	Summary & Key Objectives	Relevance to Local Plan (Part 1)
	<p>7. Landscape. 8. Open space. 9. Soils. 10. Historic environment. 11. Minerals.</p> <p>The impacts of climate change were considered as a theme that cuts across all the above themes.</p> <p>For each environmental theme, the study was required to establish:</p> <ul style="list-style-type: none"> • A baseline position – setting out what the current state of that theme is within the District. • A threshold definition – identifying the tipping point for each theme beyond which development would have an unacceptable impact. • The study was then required to test development scenarios to understand if and how they may mean that environmental limits are reached. 	
LOCAL		
<p>Analysis of Visit Frequency at Cannock Chase Special Area of Conservation 2013</p>	<p>The report was prepared for the Black Country Authorities: Dudley MBC, Sandwell MBC, Wolverhampton City Council and Walsall MBC.</p> <p>The purpose of the research was to analyse visitor survey data collected in conjunction with an AONB survey for Cannock Chase during 2010-2011. Specifically, the visitor frequency data was used to better understand the relationship between number of visits made to the SAC³ and AONB⁴ according to geographic source</p>	<p>The report was presented as part of the evidence base for the Local Plan (Part 1) Examination in Public. The report relates in particular to the Habitats Regulations of the Local Plan (Part 1) Proposed Submission and has a bearing on the recognised zone of influence for impacts on the SAC and levels of developer contributions towards mitigation</p>

³ Special Area of Conservation

⁴ Area of Outstanding Natural Beauty

2.2 Changes to Baseline Information

Table 2.2 shows the changes that have been made in response to the additional modifications to the Submission Version Local Plan (Part 1).

Table 2.2 Baseline Information Updates as a Result of Additional Modifications

Additional Modification No.	Relevant Section of SA	Updates to SA text
M4	SA Main Report Appendix C, Section 2.8 (Health)	<p>Public health remains a key issue for the district, as life expectancy continues to be lower than in surrounding areas and compared to the national average. In the 2001 Census, 9,382 residents (10% of the population) indicated that they do not have good health. Moreover, 18,308 persons (just under 20% of the population) state that they have a limiting long-term illness, in comparison with 17.9% for England. Local priorities for health improvement are cancer, stroke and heart disease. Work continues on the success of Cannock Chase PCT Clinical Commissioning Group (CCG) smoking cessation service, improving the levels of exercise and childhood health. From the 1st October 2006 Cannock Chase PCT became part of the South Staffordshire PCT. The introduction of 'health trainers' and the PCT Cannock Chase CCG Health NET organisation in the district continues to provide targeted help and advice regarding health and wellbeing.</p>
M7	SA Main Report Appendix C, Section 2.5 (Biodiversity, Fauna and Flora)	<p>Staffordshire also has a Geodiversity Action Plan (2004) which aims to conserve, through partnership working, important geological sites in the district, such as the Etching Hill Regionally Important Local Geological Site (LGS) at Etching Hill, Rugeley, and the Cannock Chase Pebble Beds. Such sites also often have high biodiversity value and in the case of the Triassic period Pebble Beds, heathland biodiversity.</p>

3. Appraisal of Post Submission Version Local Plan (Part 1), Section 1: Core Strategy

3.1 Assessment of Post Submission Version Local Plan (Part 1) and Significant Effects

3.1.1 Assessment methodology

The SA of the earlier versions of the Local Plan (Part 1) involved prediction of effects for each policy against each of 20 SA objectives in the matrices of the main SA report (Appendix E). The assessment used the significance criteria shown in Figure 3.1.

Figure 3.1 Assessment Significance Criteria

Symbol	Description
++	Very sustainable - Option is likely to contribute significantly to the SA objective
+	Sustainable - Option is likely to contribute in some way to the SA objective
0	Neutral – Option is unlikely to impact on the SA objective
?	Uncertain – It is uncertain how or if the Option impacts on the SA objective
-	Unsustainable – Option is likely to have minor adverse impacts on the SA objective
--	Very unsustainable – Option is likely to have significant adverse impacts on the SA objective

The effects were assessed in terms of geographic and temporal scale, permanence of effect and likelihood of occurrence.

- Geographic scale relates to predicting effects that will have an effect at a national, regional or local level.
- Temporal scale relates to effects that are likely to be in the short term (0-10 years); medium term (10 -20 years) and long term (over 20 years).
- Permanence criteria- Temporary or Permanent.
- Likelihood of occurrence – high, medium or low.

The assessment matrices in Table 3.1 have been modified in response to the main and additional modifications after the Local Plan (Part 1) Examination in Public hearing sessions. Table 3.1 therefore essentially shows the assessment of the Post Submission version of the Local Plan (Part 1).

To avoid confusion, only those modifications that have resulted in changes to the SA results have been presented. Similarly, only the SA objectives that have been modified are included in the matrices. Deleted Local Plan (Part 1) policy text in the matrices is shown as struck through, additional text shown in bold and CCDC comments in italics. As with changes to the plans and programmes and baseline information, changes to the SA assessment follow this format of struck through, bold text and italics.

Table 3.1 Changes to Local Plan (Part 1) Assessment as a Result of Main and Additional Modifications

CP5: Social Inclusion and Healthy Living						
Main Modification MM 5.4						
(1st paragraph) The Council will work with public, private and third sector partners to ensure that appropriate levels of infrastructure are provided to support social inclusion and healthy living in the District. Subject to viability, development proposals will be required to have regard to the wider determinants of health and make a positive contribution to provision of infrastructure, design and layout which supports social inclusion and healthy living for sustainable communities. The key elements of this infrastructure compromise: include the items identified immediately below. The Council will work with applicants to identify and agree which of those elements of infrastructure are directly related to the proposed development (and are not already fully funded from other sources) and seek to agree an appropriate level of contribution.						
SA Objective	Significance	Timescale	Likelihood	Scale	Permanence	Commentary/ mitigation
Ensure health facilities are accessible for those in need.	++	MT	M	L	T	Can be indirectly linked to air quality and sustainable transport to increase accessibility options through public transport while indirectly decreasing emissions. The delivery of health facilities may be facilitated in some cases by the requirement for development proposals to consider the wider determinants of health.
To meet the needs of the population through the protection, enhancement and creation of open spaces for leisure and recreation	++	MT	M	L	T	A key part of this policy is provision of parks, open spaces, play areas and allotments. The protection, enhancement and creation of open spaces may be facilitated in some cases by the requirement for development proposals to consider the wider determinants of health.

CP6: Housing Land**Main Modification MM 2.1**

(Final paragraph) *Replace* Depending on the results of monitoring it may be necessary to adjust the pace of delivery of housing by bringing forward, or holding back, new development with The annual review of the SHLAA and Authorities Monitoring Report (AMR) provide the mechanisms for monitoring. The SHLAA process, which involves house building professionals via the SHLAA Panel, will also help facilitate the advancement of sites into the five year deliverable supply. Alongside the SHLAA process, the Council will continue to positively engage with developers in bringing sites into the five year supply as part of the development management process. This includes positive consideration of sites not currently identified in the SHLAA (windfalls). Where the SHLAA identifies a shortfall in the five year deliverable supply of housing land, measured against the requirements of the NPPF, the Council will undertake measures to unlock existing planning permissions and bring forward currently non-consented/unallocated sites. A range of measures can be employed which include:

- working positively with developers to overcome site specific constraints (including those related to viability);
- actively considering joint working on Council-led ventures, where it is practicable;
- a positive approach to the redevelopment of appropriate existing employment sites for housing (see Policy CP8).

Main Modification MM 4.1

(Final paragraph) Annual housing completions will be monitored and a minimum five year plus 5% housing land supply ensured. **If monitoring identifies persistent under delivery of housing, a minimum five year plus 20% land supply will be provided.**

SA Objective	Significance	Timescale	Likelihood	Scale	Permanence	Commentary/mitigation
To ensure everyone has a decent and affordable home.	+	MT	M	L	T	The policy modifications clarify that houses will be brought forward into the five year deliverable supply through the SHLAA process and shows that a range of measures will be used to unlock existing planning permissions. MM4.1 also aims to improve the delivery of housing in response to monitoring. If housing growth overall is facilitated, this will increase the number of affordable homes delivered.

CP7: Housing Choice**Main Modification MM 2.2**

Insert text at end of final paragraph If the monitoring of supply against targets identifies a shortfall and/or additional demand comes forward, the Council will work positively with the Gypsy, Traveller, Travelling Showpeople communities and landowners within the broad area of search to bring forward additional pitches/plots. If necessary, a formal review of requirements and site allocations will be undertaken no later than 2021.

Main Modification MM 4.4

(First main paragraph) The overall target for affordable housing provision on commercial housebuilders' sites will be maximised, informed by an assessment of economic viability reviewed when evidence of changes in market conditions indicates this to be appropriate. This will be reviewed when changes in market conditions justify. Details will be elaborated in a Housing Choices SPD. Individual site viability issues will be considered in the context of the above evidence.

SA Objective	Significance	Timescale	Likelihood	Scale	Permanence	Commentary/mitigation
To ensure everyone has a decent and affordable home.	?	MT	M	R	T	<p>Facilitating the provision of additional plots for the Gypsy, Traveller and Travelling Showpeople communities will help these communities to obtain a decent and affordable home.</p> <p>However, the overall effect of these modifications on the overall target and delivery of affordable housing is uncertain until the Housing Choices Supplementary Planning Document is available.</p>

CP10: Sustainable Transport**Additional modification M39:**

(First paragraph) Cannock Chase Council will work with bus and rail operators, Staffordshire County Council, the West Midlands Integrated Transport Authority (Centro), Local Enterprise Partnerships (LEPs), local transport bodies and developers to help develop and promote sustainable transport modes that provide realistic alternatives to the car, and which help contribute to achieving national climate change targets **and reduce air pollution**.

SA Objective	Significance	Timescale	Likelihood	Scale	Permanence	Commentary /mitigation
Improve roadside air quality/ reduce traffic emissions	+	LT	M	R	P	In addition to improvements to cyclist facilities, policy should encourage employers to promote sustainable transport, such as green travel plans, car pools etc. Refer to locating housing and employment land in locations designed to minimise private vehicle usage. The additional reference to sustainable transport modes that will reduce air pollution will also help to achieve this SA objective.

CP13: Cannock Chase Special Area of Conservation (SAC)
Main Modification MM 3.3
 (2nd paragraph) In order to retain the integrity of the Cannock Chase Special Area of Conservation (SAC) all development within any agreed zone of influence ~~Cannock Chase District (as identified by the evidence base and subject to further refinement)~~ that leads to a net increase in dwellings which is likely to have an adverse impact on the SAC ~~should~~ **will be required to** mitigate for such adverse effects. ~~in line with~~ The ongoing work by the **relevant** partner authorities to **will** develop a Mitigation and Implementation Strategy (SPD).

SA Objective	Significance	Timescale	Likelihood	Scale	Permanence	Commentary/mitigation
Protect and enhance biodiversity, fauna and flora in both protected sites and the urban fringe	+	ST	M	R	T	<p>Policy looks to protect the SAC, however makes no reference to enhancement. Policy must press on the need for developments to make reference to Appropriate Assessments.</p> <p>The final version of the policy strengthens the wording for the mitigation required to be applicable to all residential development within the district, rather than development that falls within a specific zone of influence. This should help to protect the integrity of Cannock Chase SAC.</p>

CP15: Historic Environment**Additional Modification M46**

(1st bullet point) The safeguarding of all historic sites, buildings, **areas**, archaeological remains, **their settings** and their historic landscape and townscape **settings context** according to their national or local status from developments harmful to their significance in order to sustain character, local distinctiveness and sense of place.

SA Objective	Significance	Timescale	Likelihood	Scale	Permanence	Commentary/mitigation
Protect, enhance and manage character and quality of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place	+	MT	H	R	T	<p>The additional wording regarding the safeguarding of historic sites, in particular the protection of the <i>settings</i> of historic sites, buildings, areas and archaeological remains, should improve the achievement of this SA objective. The modifications should lead to improved protection, enhancement and management of landscape and townscape.</p>
To protect and, where possible, enhance the historic environment	++	LT	M	L	P	<p>The Historic Environment Character Assessment will inform development decision-making process and all sites and settings will be safeguarded. A new Conservation Area is also being considered.</p> <p>The additional wording regarding the safeguarding of historic sites, in particular the protection of the <i>settings</i> of historic sites, buildings, areas and archaeological remains, should improve the achievement of this SA objective. The modifications should lead to improved protection and enhancement of the historic environment.</p>

CP16: Climate change and sustainable resource use
Main Modification MM5.6 3a, 4th sentence
 All new residential developments should achieve water efficiency standards equivalent to Code for Sustainable Homes Level 3/4 of 105 litres/person/day or less (currently equivalent to Code for Sustainable Homes Level 3/4) as a minimum and should have regard to wider sustainability standards of the Code (using Level 3 as a good practice benchmark, or any future equivalent national standard).

SA Objective	Significance	Timescale	Likelihood	Scale	Permanence	Recommended/mitigation
Promote Sustainable Water resource management in order to lower demand for abstractions.	++	L	M	R/L	P	A positive impact is envisaged as sustainable construction methods such as CfSH ⁵ incorporate an element of water efficiency. However, more wording could be included on reducing abstraction needs in relation to water conservation standards. The modifications now provide more detailed water efficiency specifications for residential developments and also add a safeguard in the event that CfSH standards are replaced by equivalent national standards.
Ensure sustainable design and construction of all new developments.	++	MT	H	R	T	The modifications now provide more detailed water efficiency specifications for developments and also add a safeguard in the event that CfSH standards are replaced by equivalent national standards. This will improve the overall sustainability of new residential developments.

⁵ Code for Sustainable Homes

3.1.2 Changes to the Scoring of the Local Plan (Part 1) SA

Table 3.1 presents a summary of how the scoring of the assessment of the Core Strategy in the main SA Report has changed in relation to the main modifications of the Post Submission Version Local Plan (Part 1).

Table 3.1 Changes to Policy Assessment Scoring as a Result of Main Modifications

CS Policy	SA Objective		Commentary
	SA5	SA13	
CP7	0	?	Scoring changed from major positive to uncertain
CP16	++	0	Scoring changed from minor positive to major positive

4. Mitigation and Monitoring

4.1 Maximising Environmental Gain in the Local Plan (Part 1)

Mitigation recommendations were provided in Chapter 7 of the SA Main Report. The only change to these recommendations in relation to the main modifications is shown in Table 4.1 (with new text added in bold).

Table 4.1: Mitigation Proposals in Relation to SA Objectives.

SA/SEA topic	Relevant Preferred Option(s)	Mitigation
Social – Housing Affordability	CP7: Housing Choice	Ensure affordable housing targets are appropriate to the needs of the population of the district and predicted demographic trends.

4.2 Monitoring

The proposed SA Monitoring Framework was included as Appendix I in the January 2013 version of the SA. The final version of the Monitoring Framework will be included in the SA Post Adoption Statement.

5. Next Steps

5.1 Introduction

This addendum will be placed on the Cannock Chase website for public consultation between 6th November and 18th December 2013.

5.1.1 Cannock Chase Local Plan (Part 2)

An SA will be required for Part 2 of the Local Plan as Part 2 will include site allocations and a review of the current Green Belt boundaries. The scope of the SA will need to be determined as and when further details of the Local Plan Part 2 become available.

5.2 The Post Adoption Statement

Once the Local Plan (Part 1) is adopted, an SA Post Adoption Statement will be produced. This will summarise how environmental and sustainability considerations have been integrated into the Local Plan (Part 1), including the reasons for choosing the plan as adopted in light of other reasonable alternatives dealt with. It will also include the final version of the monitoring framework. The monitoring framework will be reviewed in light of any final comments from the Planning Inspector on the final version of the Local Plan (Part 1). The monitoring of the plan is the responsibility of CCDC.

6. Limitations

The content of the addendum is based on the information that has been made available at the time of publication. The addendum is presented as a consultation document. Any subsequent additional information arising from CCDC may allow refinement of the conclusions. It should be noted that:

- The findings of this report represent the professional opinion of experienced sustainability consultants. Halcrow does not provide legal advice and the advice of lawyers may also be required.
- All work carried out in preparing this addendum has utilised and is based upon Halcrow's professional knowledge and understanding of current relevant European Union and UK standards and codes, technology and legislation. Changes in this legislation and guidance may occur at any time in the future and cause any conclusions to become inappropriate or incorrect. Halcrow does not accept responsibility for advising of the facts or implications of any such changes.
- This addendum has been prepared using factual information contained in documents prepared by others. No responsibility can be accepted by Halcrow for the accuracy of such information.